

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

RUSTEM KAZAZI; LEJLA KAZAZI; and
ERALD KAZAZI,

Movants,

v.

U.S. CUSTOMS AND BORDER
PROTECTION; UNITED STATES OF
AMERICA; KEVIN McALEENAN,
Commissioner, U.S. Customs and Border
Protection, sued in his official capacity;
TIMOTHY STARK, agent of U.S. Customs
and Border Protection, sued in his individual
capacity; and UNKNOWN AGENTS OF U.S.
CUSTOMS AND BORDER PROTECTION,
sued in their individual capacities

Respondents.

Case No. 1:18-mc-51

Judge Dan Aaron Polster

**Movants' Motion for Admission Pro Hac
Vice of Robert J. McNamara**

Pursuant to Local Rule 83.5(h), Movants Rustem Kazazi, Lejla Kazazi, and Erald Kazazi, by and through their undersigned counsel, hereby move this Court for the admission *pro hac vice* of Robert J. McNamara, so that he may appear and participate in this case on their behalf.

Mr. McNamara is a member in good standing of the Virginia State Bar (admitted October 12, 2006, bar number 73208), the United States Supreme Court, United States Courts of Appeals for the Second, Third, Fourth, Seventh, Ninth, Eleventh and DC Circuits, and the United States District Court for the Eastern District of Virginia. A Certificate of Good Standing from the Supreme Court of the State of Virginia is attached as **Exhibit 1**.

Mr. McNamara is not now, nor has he ever been disbarred or suspended from practice before any bar, court, department, bureau, or commission anywhere in the United States, nor has he ever received any reprimand from any such bar, court, department, bureau, or commission pertaining to conduct or fitness as a member of the bar.

His contact information is:

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To the extent that good cause is required for admission *pro hac vice*, good cause exists. Mr. McNamara and the Institute for Justice have experience working on civil forfeiture cases, like this case, in which property owners have had relatively small sums of money seized from them. The Institute for Justice is a non-profit, public-interest law firm, which represents all of its clients *pro bono*. The Kazazis believe that they will benefit from the *pro bono* representation of Mr. McNamara and the Institute for Justice, as they work to navigate the complex procedural and substantive issues raised by this case. Of particular benefit to the Kazazis is the Institute for Justice's willingness to provide legal services for free, so that the value of the property at issue is not outstripped by the cost of litigating for its rightful return.

For the foregoing reasons, local counsel for the Kazazis respectfully requests that this Court enter an Order granting the admission *pro hac vice* of Robert McNamara.

DATED this July 24, 2018.

Respectfully submitted,

/s/ Patrick T. Lewis

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* Admitted *pro hac vice*

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** Motion for admission *pro hac vice*
pending

CERTIFICATE OF SERVICE

I hereby certify that on July 24, 2018, a copy of the foregoing Motion and the accompanying exhibit was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to Defendants/Respondents indicated on the electronic filing receipt. All other parties will be served through regular US mail. Parties may access this filing through the Court's system.

/s/ Patrick T. Lewis
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